

REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Initially, applicants note with respect to the statement in paragraph 3 of the Office Action, in the Related Case Statement filed on August 29, 2002 the noted serial no. 09/852,620 denotes the present application, and therefore a copy was not provided.

Claims 1-39 are pending in this application. Claims 1-10, 28, 29, 34, and 35 were rejected under 35 U.S.C. § 102(a) as disclosed by U.S. patent publication 2001/0048753 A1 to Lee et al. (herein "Lee"). Claims 11-23, 30-32, and 36-38 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee as applied to claims 1-5, and further in view of U.S. patent 6,504,569 to Jasinschi et al. (herein "Jasinschi"). Claims 24-27, 33, and 39 were rejected under 35 U.S.C. § 103 as unpatentable over Lee as applied to claims 1-5, and further in view of "Panoramic Image Mosaics" to Shum et al. (herein "Shum").

Addressing the above-noted rejections based on Lee, and Lee further in view of Jasinschi or Shum, those rejections are traversed by the present response.

Applicants initially note that each of the independent claims is amended by the present response to clarify features recited therein. Specifically, independent claim 1 as an example now recites a step of "extracting an object from each of the frames". Independent claim 1 also recites "approximating the object of each of the frames using one of predetermined figures defined by representative points for each of the frames". Independent claim 1 further recites in the extracting the representative points, "one of the representative points being a reference point represented by a coordinate value and one of the representative points being represented by a relative position data with reference to the reference point". Independent claim 1 now also clarifies operations of approximating first and second trajectories, "the second trajectory being obtained by arranging, in the frames advancing direction, the relative position data about the one of the remaining points with reference to the

reference point". The other independent claims are similarly amended as in independent claim 1 noted above.

The above-noted claim amendments are fully supported by the original specification, for example at pages 5 and 6 and in the present specification at page 29, line 3 to page 30, line 11. As clarified in the claims, the movement of representative points between frames is described as a function. As even now more particularly clarified in the claims, a first trajectory is approximated with a first function and a second trajectory is approximated with a second function.

Further, the claims also set forth that the first trajectory is obtained by arranging position data about the reference points and the second trajectory is obtained by arranging relative position data about one of the remaining points with reference to a reference point, those remaining representative points being represented by relative position data.

With the above-noted structure and operation in the claimed invention, the movement of an object is not described for every frame.

In contrast to the claimed features, Lee discloses an operation of estimating a movement of an object between frames. More particularly, as noted in paragraphs [0015] to [0022], in the device of Lee a user identifies a rough outline of an object in a frame and the movement of the object is tracked through the video sequence. Thus, in Lee the motion information is described for every frame.

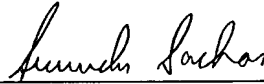
In contrast to Lee, and as noted above, the claims describe movement of a representative point between the frames as a function, particularly the claimed first and second functions, and thus in the claims the movement of the object is not described for every frame.

In such ways, applicants respectfully submit that the claims as currently written clearly distinguish over the teachings in Lee. Moreover, no teachings in Jasinschi or Shum can overcome the above-noted deficiencies in Lee with respect to the amended claims.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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